

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PAMELLA WILLIAMS, on behalf of herself
and all other similarly situated,

Plaintiffs,

v.

NOTICE OF MOTION FOR ENTRY
OF DEFAULT JUDGMENT PURSUANT
TO FRCP 55(b)(2) AND INJUNCTIVE
RELIEF

1:20-cv-01741-RA

LORAC COSMETICS, LLC,

Defendant,

PLEASE TAKE NOTICE, that Plaintiff, PAMELLA WILLIAMS, shall move this Court, at a date and time to be set by this Honorable Court, for the entry of judgment by default, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure (“Fed.R.Civ.P.”), and Local Rule 55.2(b), against Defendant, LORAC COSMETICS, LLC, and for any other relief that this Honorable Court may deem just and proper. The reasons supporting the Plaintiff’s request for entry of judgment by default are set forth within the attached Affirmation of David P. Force, Esq., along with sufficient facts, the attached Certificate of Default dated July 28, 2020 (Ex. C), and other documents appearing in the Court’s file and upon such evidence, oral or documentary, as may be presented prior to or at the hearing upon this motion.

Dated: August 11, 2020

Respectfully Submitted,

/s/ David P. Force
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